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MARY E. ANDREA CLERK
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By: SPERO T. LAPPAS, Esquire
Pa. Supreme Court ID no. 25745
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RANDY YORDY, PLAINTIFF v.	:	
	:	CIVIL ACTION 1:01-cv-0206
SCOTT BROWN, individually and in his official capacity as an employee and agent of the PENNSYLVANIA STATE POLICE Defendant	:	JURY TRIAL DEMANDED
	:	JUDGE KANE
PAUL EVANKO, individually and in his official capacity as an employee and agent of the PENNSYLVANIA STATE POLICE Defendant, et alii	:	

PRAECIPE TO ATTACH REVISED WITNESS AND EXHIBIT LISTS
TO PLAINTIFF'S PRETRIAL MEMORANDUM

SERRATELLI, SCHIFFMAN BROWN AND CALHOON, P.C.
By: SPERO T. LAPPAS, Esquire

Please attach Exhibits A and B hereto, the revised Exhibit and Witness Lists to the Plaintiff's Pretrial memorandum.¹

RESPECTFULLY SUBMITTED,

SERRATELLI, SCHIFFMAN, BROWN AND CALHOON, P.C.

By:

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ATTORNEYS FOR THE PLAINTIFF

¹ The new witness and exhibits relate to an incident by which Defendant Scott Brown was fired from the Pennsylvania State Police for job related misconduct while on duty. This information was never revealed by the defense to Plaintiff's counsel who discovered it independently between December 12 and 16, 2002.

SERRATELLI, SCHIFFMAN BROWN AND CALHOON, P.C.

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WITNESS.LST.wdb - YORDY WIT**WITNESS #** **WITNESS**

1 BARRY BRINSER
2 BERON STEAGER
3 BRIAN PLASTERER
4 C. TOWNSEND VELKOFF, MS
5 CHARLES FORTNEY
6 CHARLES MACKLIN, ESQUIRE
7 CHARLES SCHMIDT, ESQUIRE
8 CHRISTINE KOSH, PSP
9 COLEMAN McDONOUGH, PSP
10 DEFENSE TECHNOLOGY CORP
11 DONNA BROWN
12 EARL BLOSE
13 ELIZABETH VALENTINE
14 ERNST BALTIMORE, PSP
15 FRANCIS GROLEMUND, PSP
16 GEORGE PEACH, PSP
17 GLENN DOMON, PSP
18 GORDON BUSHELL, MD
19 HERSHEY MEDICAL CENTER
20 JOSHUA LOCK, ESQUIRE
21 KATHERINE DOUTT, PSP
22 KENNETH HILL, PSP
23 LARRY WILLIAMS, PSP
24 LINDA BONNEY, PSP HR DIR
25 LYNNE MOUNTZ
26 MERVIN RODRIGUEZ, PSP
27 MICHAEL GREEVY, PHD
28 PAUL EVANKO
29 PSP RECORDS CUSTODIAN
30 RANDY YORDY
31 ROBERT CLARK, PSP
32 ROBERT MRGICH
33 ROBERT MRGICH, PSP
34 ROGELIO GARCIA
35 ROGER CADIEUX, MD
36 ROGER SANTIWANY
37 SCOTT BROWN
38 STEPHEN CARUSO
39 STEPHEN KISSLING,PSP
40 SUSQUEHANNA HEALTH SYS.
41 SYLVIA CUETO
42 UNIVERSITY EMS SERVICE
43 VICKIE RAE SMITH
44 WILLIAM FULTON, ESQUIRE
45 ROBERT TITLER, PSP
46 SAMUEL PATTERSON, PSP
47 TODD BRIAN, PSP
48 LEON BROWN, PSP
49 KEVIN KEARNEY, PSP
50 MARSHALL MARTIN, PSP

EXHIBIT #	EXHIBIT	DATE OF EXHIBIT IDENTIFIED/ADMITTED
1	1.01	DEPOSITION OF SCOTT BROWN (CCP)
2	1.02	DEPOSITION OF SCOTT BROWN (MDPA)
3	1.03	FIREARMS SCORING TALLY SHEET FOR SCOTT BROWN
4	1.04	VIDEOTAPE OF ASSAULT
5	1.05	MEMO FROM BROWN TO GROLEMUND
6	1.06	SCHMIDT, RONCA, AND KRAMER COMMERCIAL VIDEOTAPE
7	1.07	MEMO RE SCOTT BROWN (BPR 10248/DAR)
8	1.08	PHOTOGRAPHS OF SCOTT BROWN
9	1.09	SCOTT BROWN INTERVIEW
10	1.10	PLEADINGS IN BROWN V. YORDY
11	1.11	HERSHEY MEDICAL CENTER RECORDS FOR SCOTT BROWN
12	1.12	AMBULANCE RECORDS FOR SCOTT BROWN
13	2.01	DEPOSITION OF BARRY BRINSER
14	2.02	DEPOSITION OF BARRY BRINSER (CCP)
15	2.03	STATEMENT OF BARRY BRINSER
16	2.04	HOSPITAL RECORDS FOR BARRY BRINSER
17	3.01	DEPOSITION OF BERON STEAGER
18	3.02	DEPOSITION OF BERON STAEGER (CCP ACTION 5320 S 2000)
19	3.03	STATEMENT OF BERON STEAGER
20	4.01	DEPOSITION OF PAUL EVANKO
21	5.01	DEPOSITION OF VICKIE SMITH
22	5.02	DEPOSITION OF VICKIE RAE SMITH (CCP)



EXHIBIT #	EXHIBIT	DATE OF EXHIBIT	IDENTIFIED ADMITTED
23	5.03	RECORDS FOR COMMONWEALTH V VICKIE RAE SMITH	
24	5.04	CRIMINAL COMPLAINT COMMONWEALTH V VICKIE SMITH	
25	6.01	GENERAL INVESTIGATION REPORT IAD 11-257	April 09, 1999
26	6.02	PSP INCIDENT REPORT H1-1051327	February 09, 1999
27	6.03	SEARCH WARRANT, APPLICATION, INVENTORY AND RECORDS SEIZED	March 04, 1999
28	6.04	DEPOSITION OF STEPHEN CARUSO (CCP)	June 11, 2002
29	6.05	CHEMICAL TESTINGS WARNING FOR RANDY YORDY	February 09, 1999
30	6.06	DEPOSITION OF STEPHEN KIESLING (CCP)	September 04, 2002
31	6.07	PSP COMMUNICATIONS MEMO	
32	6.08	PSP RADIO COMMUNICATIONS TAPE	February 04, 1999
33	6.09	MATERIAL DATA SAFETY SHEET	
34	6.10	PSP FORENSICS CID REPORT RE BROWN'S FIREARM	March 11, 1999
35	6.11	STATEMENT OF MERVIN RODRIGUEZ, PSP	February 05, 1999
36	6.12	DEPOSITION OF ROBERT CLARK (CCP)	September 04, 2002
37	6.13	AERIAL PHOTOS OF OLD JONESTOWN ROAD	March 11, 1999
38	6.14	PHOTOGRAPHS OF INCIDENT (A,B,C,D)	
39	7.01	PERSONNEL FILE FOR SCOTT BROWN	
40	7.02	DISCIPLINARY RECORD RE SCOTT BROWN	
41	7.03	DISCIPLINARY ACTION REPORT RE SCOTT BROWN	December 10, 1997
42	7.04	ARBITRATION OPINION AND AWARD	June 28, 1998
43	7.05	ARBITRATION OPINION RE SCOTT BROWN	April 26, 1999
44	7.06	DISCIPLINARY SUMMARY REPORT	April 30, 1997

EXHIBIT #	EXHIBIT	DATE OF EXHIBIT IDENTIFIED	ADMITTED
45	7.07	GENERAL INVESTIGATION REPORT RE SCOTT BROWN	May 09, 1997
46	7.08	EMPLOYEE PERFORMANCE REVIEW	March 05, 1999
47	7.09	MEMO TO LINDA BONNEY	September 19, 2000
48	8.01	DEPOSITION OF RANDY YORDY	
49	8.02	DEPOSITION OF RANDY YORDY (CCP)	June 11, 2002
50	8.03	RECORDS FOR COMMONWEALTH V. YORDY	
51	8.04	PHOTOGRAPHS OF RANDY YORDY	
52	8.05	CRIMINAL COMPLAINT COMMONWEALTH V YORDY	
53	8.06	HERSHEY MEDICAL CENTER RECORDS FOR RANDY YORDY	
54	8.07	MEDICAL BILLS FOR RANDY YORDY	
55	8.09	PRELIMINARY HEARING TRANSCRIPT, COMM V YORDY	February 23, 1999
56	8.10	EMERGENCY ROOM REPORT OF SYLVIA CUETO MD (RANDY YORDY)	February 04, 1999
57	8.11	EMERGENCY ROOM REPORT OF ELIZABETH VALENTINE MD (RANDY YORDY)	February 05, 1999
58	8.12	AMBULANCE RECORDS FOR RANDY YORDY	February 04, 1999
59	9.01	PSYCHOLOGICAL RECORDS FOR SCOTT BROWN	
60	9.02	PSYCHIATRIC REPORT RE SCOTT BROWN	December 12, 2000
61	9.03	PSYCHIATRIC REPORT RE SCOTT BROWN	November 17, 2000
62	9.04	RECORDS OF MICHAEL GREEVY	
63	9.04	MENTAL HEALTH RECORDS FOR SCOTT BROWN	
64	10.01	RECORDS RELATING TO CHRISTINE KOSH INCIDENT	
65	11.01	RECORDS RELATING TO BRIAN PLASTERER INCIDENT	
66	12.01	RECORDS RELATING TO ROGELIO GARCIA INCIDENT	

EXHIBIT #	EXHIBIT	DATE OF EXHIBIT	IDENTIFIED ADMITTED
67	12.02	COURT PAPERS RE GARCIA V BROWN	
68	12.03	STATEMENT OF ROGER SENTIWANY RE ROGELIO GARCIA INCIDENT	
69	12.04	SWORN STATEMENT OF CHARLES FORTNEY RE ROGELIO GARCIA	November 19, 1996
70	13.01	RECORDS RE EARL BLOSE INCIDENT	
71	13.02	INTERNAL AFFAIRS INVESTIGATION RE EARL BLOSE INCIDENT	
72	13.03	LETTER #1 FROM CAPT KATHRYN DOUTT TO EARL BLOSE	March 29, 1994
73	13.04	LETTER #2 FROM CAPT KATHERINE DOUTT TO EARL BLOSE	March 29, 1994
74	14.01	GENERAL INVESTIGATION REPORT RE 4/10/96	June 18, 1996
75	14.02	LETTER FROM KENNETH HILL	
76	15.01	MEMORANDUM FROM CAPTAIN TITLER TO CAPTAIN McDONOUGH	September 10, 2002
77	15.02	RECORDS RE BARBARA CHRISTIE/APRIL 3,2002 INCIDENT	
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CERTIFICATE OF SERVICE

I hereby certify that on this date I served a true copy of the attached document upon the person(s) named below by mailing a copy addressed as follows, postage pre-paid, deposited into the U. S. Mail at Harrisburg, Pa.

GREGORY NEUHAUSER, ESQUIRE
OFFICE OF ATTORNEY GENERAL
LITIGATION SECTION
15TH FLOOR, STRAWBERRY SQUARE
HARRISBURG, PA. 17120

RESPECTFULLY SUBMITTED,

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S
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December 16, 2002

SERRATELLI, SCHIFFMAN BROWN AND CALHOON, P.C.
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